IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Lordstown Motors Corp, et al., 1

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: Docket No. 923

CERTIFICATE OF NO OBJECTION REGARDING DEBTORS' SECOND MOTION FOR AN ORDER EXTENDING THE DEADLINE FOR THE DEBTORS TO ASSUME OR REJECT UNEXPIRED LEASES OF NONRESIDENTIAL REAL PROPERTY PURSUANT TO 11 U.S.C. § 365(d)(4)

The undesigned hereby certifies that, as of the date hereof, no answer, objection, or any responsive pleading to the *Debtors' Second Motion for an Order Extending the Deadline for the Debtors to Assume or Reject Unexpired Leases of Nonresidential Real Property Pursuant to 11 U.S.C.* § 365(d)(4) [Docket No. 923] (the "Motion") filed by the debtors and debtors in possession in the above-captioned cases (collectively, the "Debtors") with the United States Bankruptcy Court for the District of Delaware (the "Court") on January 19, 2024.

The undersigned further certifies that they have reviewed the Court's docket in these cases and no answer, objection, or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Motion and Hearing filed contemporaneously with the Motion, responses to the Motion were to be filed no later than 4:00 p.m. (Eastern Daylight Time) on February 2, 2024 (the "Objection Deadline"). The Debtors therefore respectfully request that the proposed form of order attached hereto as <u>Exhibit A</u>, which is materially in the same form filed with the Motion, be entered at the earliest convenience of the Court.

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

Dated: February 5, 2024 Wilmington, Delaware

Respectfully submitted,

/s/ Morgan L. Patterson

WOMBLE BOND DICKINSON (US) LLP

Donald J. Detweiler (DE Bar No. 3087) Morgan L. Patterson (DE Bar No. 5388) 1313 North Market Street, Suite 1200 Wilmington, Delaware 19801 Telephone: (302) 252-4320

Facsimile: (302) 252-4320 facsimile: (302) 252-4330 don.detweiler@wbd-us.com morgan.patterson@wbd-us.com

Counsel to the Debtors and Debtors in Possession

WHITE & CASE LLP

Thomas E Lauria (admitted *pro hac vice*)
Matthew C. Brown (admitted *pro hac vice*)
Fan B. He (admitted *pro hac vice*)
200 South Biscayne Boulevard, Suite 4900
Miami, FL 33131
Telephone: (305) 371-2700
tlauria@whitecase.com
mbrown@whitecase.com
fhe@whitecase.com

David M. Turetsky (admitted *pro hac vice*) 1221 Avenue of the Americas New York, NY 10020 Telephone: (212) 819-8200 david.turetsky@whitecase.com

Jason N. Zakia (admitted *pro hac vice*) 111 South Wacker Drive, Suite 5100 Chicago, IL 60606 Telephone: (312) 881-5400 jzakia@whitecase.com

Roberto Kampfner (admitted *pro hac vice*)
Doah Kim (admitted *pro hac vice*)
RJ Szuba (admitted *pro hac vice*)
555 South Flower Street, Suite 2700
Los Angeles, CA 90071
Telephone: (213) 620-7700
rkampfner@whitecase.com
doah.kim@whitecase.com
rj.szuba@whitecase.com

Counsel to Debtors and Debtors in Possession